

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RM ACQUISITION, LLC d/b/a RAND MCNALLY, a Delaware limited liability company,

Plaintiff,

v.

ONE20, INC., a Minnesota corporation, and CHRISTIAN SCHENK, individually and as an agent for One20, Inc.,

Defendants.

Case No. 17-cv-03019

Hon. Harry D. Leinenweber

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants One20, Inc. and Christian Schenk (collectively “Defendants”), by and through their undersigned counsel, respectfully request that this Court grant a 21-day extension of time, to and including **May 19, 2017**, to answer or otherwise respond to Plaintiff RM Acquisition, LLC d/b/a Rand McNally’s (“Plaintiff”) First Amended Complaint. In support of this unopposed motion, Defendants state as follows:

1. Plaintiff filed its First Amended Complaint in the Chancery Division of the Circuit Court of Cook County, Illinois on February 21, 2017. Plaintiff amended its complaint before serving it on Defendants. On March 22, 2017, Defendants were served with the First Amended Complaint.

2. Thereafter, on April 21, 2017, Defendants timely removed Plaintiff's action to this Court pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

3. Pursuant to Fed. R. Civ. P. 81(c), Defendants' answer or other responsive pleading is currently due on April 28, 2017.

4. Defendants respectfully request an extension of time to and including May 19, 2017 to file their answer or other responsive pleading to the First Amended Complaint.

5. Defendants' counsel has conferred with Plaintiff's counsel, and Plaintiff has no objection to the extension of time requested by Defendants.

6. Accordingly, the Defendants respectfully request a 21-day extension of time, to and including May 19, 2017, to file their answer or other responsive pleading.

7. This is the first request for extension of time in this case, and it is made in good faith and not for purposes of delay.

WHEREFORE, for the reasons set forth above, Defendants respectfully request a 21-day extension of time, to and including May 19, 2017, to file their answer or other responsive pleading, and for any further relief that is appropriate under the circumstances.

Dated: April 26, 2017

Respectfully submitted,

ONE20, INC. AND CHRISTIAN SCHENK,

/s/ Mark H. Horwitch

One of Their Attorneys

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